

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

BAD RIVER BAND OF THE LAKE  
SUPERIOR TRIBE OF CHIPPEWA INDIANS  
OF THE BAD RIVER RESERVATION

*Plaintiff,*

v.

ENBRIDGE ENERGY COMPANY, INC., and  
ENBRIDGE ENERGY, L.P.

*Defendants.*

Case No. 3:19-cv-00602

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ENBRIDGE ENERGY, L.P.

*Counter-Plaintiff,*

v.

BAD RIVER BAND OF THE LAKE  
SUPERIOR TRIBE OF CHIPPEWA INDIANS  
OF THE BAD RIVER RESERVATION and  
NAOMI TILLISON, in her official capacity

*Counter-Defendants.*

Judge William M. Conley  
Magistrate Judge Stephen Crocker

**DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

Defendants respectfully submit this motion for partial summary judgment on Counts 1, 2, 4, and 5 of the Third Amended Complaint. *See* Fed. R. Civ. P. 56(a). This motion is supported by the accompanying Brief in Support, the Declarations of Julie Molina and Mark Maxwell, and the Defendants' Proposed Findings of Fact.

Dated this 6th day of May, 2022

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Respectfully submitted,

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*Counsel for Enbridge Energy Company, Inc., and  
Enbridge Energy, Limited Partnership*

**CERTIFICATE OF SERVICE**

I certify that on May 6, 2022, I served the foregoing document on all counsel of record using the Court's ECF system.

/s/ Joseph S. Diedrich  
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